

EXHIBIT E3

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES

3 JOANNE ANDERSON and
4 GARY ANDERSON,
5 Plaintiffs,
6 vs.
7 BORG-WARNER CORPORATION by
8 its successor-in-interest
BORG-WARNER MORSE TEC,
INC., et al.,
9 Defendants.
10
11 CAROLYN WEIRICK and ELVIRA
GRACIELA ESCUDERO LORA,
12 Plaintiffs,
13 vs.
14 BRENNETAG NORTH AMERICA,
INC., etc., et al.,
15 Defendants.
16
17 DEPOSITION OF
18 WILLIAM E. LONGO, PhD
19 March 29, 2018
20 10:00 a.m.
21 11340 Lakefield Drive
Suite 200
Johns Creek, Georgia
22
Debra R. Luther, RMR, CRR, CCR-B-881
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10:58:21 1 aspect ratios are for what they call nonasbestos
 10:58:24 2 tremolite.
 10:58:25 3 Q. I lost -- I got lost somewhere in there
 10:58:28 4 because the question is had someone asked you to take
 10:58:33 5 one further step and answer whether or not this is
 10:58:38 6 asbestosiform or not that you're looking at, I'll just
 10:58:41 7 ask the simple question could you?
 10:58:44 8 A. I would say with the data we have now,
 10:58:47 9 it's all asbestosiform.
 10:58:48 10 Q. All of it?
 10:58:49 11 A. Everything that's above 5:1 aspect ratio,
 10:58:54 12 it meets Blount's definition, it matches the NIST
 10:59:01 13 tremolite standard, it matches the Campbell
 10:59:04 14 definition, so I guess I'm leaning there.
 10:59:06 15 I don't know if I would say within a
 10:59:08 16 reasonable degree of scientific certainty, but if you
 10:59:09 17 want to look at a population, you know, we're looking
 10:59:11 18 at almost 300 particles out of all these talcs, so
 10:59:15 19 why wouldn't they all be -- they're all asbestos.
 10:59:19 20 Q. I just want to make sure I have you on the
 10:59:21 21 record for this. And your testimony is every fiber
 10:59:24 22 you've looked at that you've described as an
 10:59:27 23 amphibole is asbestosiform in these studies?
 10:59:29 24 A. I'm leaning towards that way because we're
 10:59:33 25 building a population of fibers that we're looking

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11:00:46 1 A. Not off my chest. It's my opinion.
 11:00:49 2 Q. I have you down that your opinion is every
 11:00:53 3 fiber you've identified in any of these studies is
 11:00:57 4 asbestosiform, and I'll move on. Okay?
 11:00:59 5 A. I said I'm getting there, that we're
 11:01:02 6 building up a population of positive samples where
 11:01:05 7 we're looking at the aspect ratio and how it matches
 11:01:08 8 up to what Blount says as well as what Campbell says.
 11:01:11 9 Certainly it's all asbestos, by
 11:01:13 10 definition. Is every fiber asbestosiform? Can you
 11:01:16 11 tell if it's a 5:1 aspect ratio?
 11:01:18 12 But I think as we build up this population
 11:01:21 13 of fibers -- and of course we have 80 MDL samples
 11:01:25 14 now, and we'll be working through those, and that
 11:01:27 15 will give us the different mines. You know, assuming
 11:01:31 16 that some percentage of them are positive, we can
 11:01:34 17 start building up a population of fibers versus the
 11:01:37 18 less than 5:1 aspect ratio and how that meets up with
 11:01:42 19 the Blount and Campbell chart.
 11:01:44 20 Q. I don't want to go through this in any
 11:01:49 21 huge detail. There's a difference in the methodology
 11:01:51 22 Blount uses in testing and the methodology you used
 11:01:56 23 here. That's not a matter of serious dispute, is it?
 11:02:00 24 A. Well, she used polarized light microscopy,
 11:02:02 25 but she's used the Blount -- I'm calling it the

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10:59:35 1 at, fibers and bundles.
 10:59:36 2 I have given the testimony that anything
 10:59:38 3 we -- anytime we see a bundle, in my opinion it's
 10:59:42 4 asbestosiform. I've given that over and over.
 10:59:46 5 Now we're looking at just regular fibers.
 10:59:47 6 If the regular fibers fit in the aspect ratio of what
 10:59:51 7 Blount calls asbestos, then I'm saying it's all
 10:59:54 8 asbestos, as well as the counting rules.
 10:59:56 9 Is that enough of a population to make
 11:00:00 10 Sanchez happy, since they're pushing the it's all
 11:00:05 11 nonasbestosiform and not a problem, like the Libby,
 11:00:08 12 Montana, was all nonasbestosiform and not a problem?
 11:00:12 13 Let's see. What other mines did they get into and
 11:00:15 14 say it was all nonasbestosiform and not a problem? It
 11:00:18 15 seems to be -- at least in my opinion, it seems to be
 11:00:21 16 an effort from the group to make it all
 11:00:24 17 nonasbestosiform.

11:00:25 18 What we're looking at is here's the
 11:00:26 19 counting rules, it's asbestos, all the bundles are
 11:00:30 20 asbestos, are all asbestosiform, according -- because
 11:00:35 21 it's unclear to me how, when you break up rock
 11:00:37 22 pieces, that you can form bundles.

11:00:40 23 Q. You understand I'm going to object to that
 11:00:43 24 as nonresponsive. You got it off your chest, but I'm
 11:00:45 25 going to object to it.

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11:02:05 1 Blount liquid density method, but it's obviously an
 11:02:09 2 ISO method too for heavy density liquid, and she did
 11:02:13 3 PLM and then she did what her size distribution was.
 11:02:16 4 Our size distribution matches pretty well
 11:02:18 5 except on the tail end. So we have a chart of what's
 11:02:26 6 said, here's what's in cosmetic talc, here's what I
 11:02:28 7 found, she compared it to Campbell, Campbell says
 11:02:32 8 this is what the aspect ratio is on tremolite
 11:02:34 9 asbestos, and our aspect ratios -- peak aspect ratios
 11:02:39 10 are slightly higher than that. I can only conclude
 11:02:42 11 if you look at all our aspect ratios for what's been
 11:02:45 12 used so far, it matches all asbestos for their two
 11:02:48 13 charts.

11:02:48 14 Q. But you know that my question was you
 11:02:51 15 didn't use the identical methodology that she used.
 11:02:54 16 That was my only question.

11:02:55 17 A. No, we didn't use the identical
 11:02:58 18 methodology.

11:02:59 19 Q. Okay.

11:02:59 20 A. But we got almost identical results.

11:03:10 21 Q. So did you have any discussion at all with
 11:03:12 22 Mr. Lanier or Mr. Panatier or anybody as a part of
 11:03:16 23 this process about answering the question in your
 11:03:21 24 report about whether this is asbestosiform or not, or
 11:03:24 25 was it just never discussed?

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11:03:25 1 A. I didn't get any directions from
 11:03:28 2 Mr. Panatier or Mr. Satterley or Mr. Lanier. I have
 11:03:33 3 just been going along, and as things come up, we
 11:03:37 4 research, do work on it, you know, we're doing more
 11:03:40 5 and more work. I've testified in the past that if
 11:03:43 6 it's a bundle, it's asbestiform; and if you're just
 11:03:47 7 looking at single fibers, you can't tell.

11:03:49 8 Q. And what are the limitations of TEM in
 11:03:52 9 connection with answering that question?

11:03:55 10 A. TEM is looking at the single fiber, single
 11:03:59 11 bundles, and there's no way to tell with just TEM, if
 11:04:04 12 you're looking at a single fiber, if it's asbestiform
 11:04:07 13 or not.

11:04:07 14 Q. Well, if it is the bundle that you say
 11:04:10 15 makes them, in part, asbestiform, can you and I agree
 11:04:14 16 you're not seeing that on TEM?

11:04:16 17 A. Seeing bundles all the time. I mean, half
 11:04:21 18 to three quarter of what we find are actually
 11:04:25 19 bundles.

11:04:25 20 I think I heard somewhere somebody
 11:04:27 21 testified you can't tell that there's a bundle in
 11:04:29 22 TEM. Every TEM counting protocol has the definition
 11:04:32 23 for bundles, so it certainly is something that is
 11:04:35 24 routinely observed, acknowledged, and written down in
 11:04:40 25 TEM analysis.

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11:04:40 1 Q. Let's just stay with what you've testified
 11:04:43 2 to in this litigation and see if that's changed.

11:04:46 3 Do you hold the opinion that based upon
 11:04:48 4 the testing you've done, you could not say to a
 11:04:54 5 reasonable degree of scientific certainty that any
 11:04:57 6 particular fiber you've identified was asbestiform?
 11:05:00 7 Have you said that so far in your testimony?

11:05:04 8 A. I may have.

11:05:06 9 Q. Okay. Would you ever write a report that
 11:05:14 10 described tremolite as asbestiform versus not
 11:05:19 11 commenting at all?

11:05:20 12 A. I don't know.

11:05:21 13 Q. You told me earlier that was more a
 11:05:23 14 question for geology.

11:05:26 15 A. No, it's not a question for geology. This
 11:05:29 16 whole asbestiform and nonasbestiform is nothing more
 11:05:31 17 than a geological commercial term for the grade of
 11:05:35 18 asbestos found in any particular mine. The more,
 11:05:39 19 quote, asbestiform it is, the more fibrous habitat,
 11:05:42 20 the more cross fiber, the more it's worth to whoever
 11:05:45 21 owns the mine. That's where this came from.

11:05:48 22 It's been -- now it's trying -- and now
 11:05:51 23 it's creeping into the actual -- people are trying to
 11:05:54 24 use it in fibers, in bundles, and what we find in
 11:05:58 25 accessory minerals, it's not appropriate for that.

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11:06:01 1 Q. Have you ever done -- well, strike that.
 11:06:07 2 It sounds to me as though you are
 11:06:09 3 confident that you're familiar with when and how this
 11:06:12 4 debate of asbestiform came to being; correct?
 11:06:18 5 A. Correct.
 11:06:18 6 Q. Have you ever gone back and looked at the
 11:06:21 7 literature over the last 75 years to see whether or
 11:06:24 8 not the issue of asbestiform was written on back
 11:06:28 9 then?

11:06:28 10 A. Not so much that it's written, but I've
 11:06:31 11 looked at the questions I have received, like, for
 11:06:35 12 example, you didn't determine the tensile strength
 11:06:39 13 because asbestiform has high tensile strength.

11:06:42 14 Well, chrysotile has high tensile
 11:06:46 15 strength. Amosite has high tensile strength.
 11:06:49 16 Crocidolite has high tensile strength. Tremolite and
 11:06:54 17 anthophyllite do not, as compared to the others. And
 11:06:57 18 the TEM is absolutely impossible to determine the
 11:07:01 19 tensile strength.

11:07:01 20 Q. Okay.

11:07:02 21 A. In a PLM sample it is absolutely
 11:07:04 22 impossible to determine the tensile strength. You
 11:07:06 23 have to take a sample out of the mine. So I've gone
 11:07:09 24 back and looked at other papers where they talked
 11:07:12 25 about we did tensile strength because we were heat

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11:07:18 1 Q. Let's just stay with what you've testified
 11:07:20 2 to in this litigation and see if that's changed.

11:07:20 3 Do you hold the opinion that based upon
 11:07:22 4 the testing you've done, you could not say to a
 11:07:25 5 reasonable degree of scientific certainty that any
 11:07:28 6 particular fiber you've identified was asbestiform?
 11:07:30 7 Have you said that so far in your testimony?

11:07:33 8 A. I may have.

11:07:37 9 Q. Okay. Would you ever write a report that
 11:07:39 10 described tremolite as asbestiform versus not
 11:07:43 11 commenting at all?

11:07:46 12 A. I don't know.

11:07:50 13 Q. You told me earlier that was more a

11:07:54 14 question for geology.

11:07:58 15 A. No, it's not a question for geology. This
 11:08:00 16 whole asbestiform and nonasbestiform is nothing more
 11:08:02 17 than a geological commercial term for the grade of
 11:08:04 18 asbestos found in any particular mine. The more,
 11:08:06 19 quote, asbestiform it is, the more fibrous habitat,
 11:08:08 20 the more cross fiber, the more it's worth to whoever

11:08:11 21 owns the mine. That's where this came from.

11:08:15 22 It's been -- now it's trying -- and now
 11:08:18 23 it's creeping into the actual -- people are trying to
 11:08:20 24 use it in fibers, in bundles, and what we find in
 11:08:22 25 accessory minerals, it's not appropriate for that.

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11:08:24 1 why is a geological commercial term coming up with
 11:08:29 2 accessory minerals found in talc, trying to truncate
 11:08:33 3 in a geological commercial term into what's found in
 11:08:37 4 these accessory minerals? It doesn't make any sense
 11:08:45 5 to me.

11:08:45 6 Q. So it's a distinction without a
 11:08:49 7 difference, in your view, and shouldn't be included
 11:08:51 8 in an expert report assessing fibers?

11:08:53 9 A. I don't know about any expert report.

11:08:56 10 Again, what we do is we look at it and define it as
 11:09:01 11 specified by the counting rules.

11:09:03 12 Q. Okay. The counting rules. Did you
 11:09:10 13 discuss with Mr. Lanier what definition you would use
 11:09:17 14 to answer the question whether amphibole fibers were
 11:09:20 15 contained within talc?

11:09:22 16 A. To answer the question if there was
 11:09:24 17 amphibole asbestos contained in the talc, no, I
 11:09:27 18 didn't discuss with any attorneys what I was going to
 11:09:30 19 do. That's not appropriate.

11:09:32 20 Q. I'm just asking. Nobody asked you then or
 11:09:36 21 since then how you came up with the method you
 11:09:41 22 determined you would use?

11:09:44 23 A. I'm sure I've been asked by everybody.

11:09:47 24 It's in my report.

11:09:50 25 Q. Tell me, for example, when you looked
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11:11:20 1 than it is wide can include things other than
 11:11:23 2 asbestos; correct?

11:11:25 3 MR. PANATIER: Just going to object to
 11:11:29 4 vague and ambiguous as to the methodology.

11:11:32 5 THE WITNESS: I don't know about
 11:11:33 6 everything, but at least everything we've
 11:11:36 7 counted, it's met the minimum definition and
 11:11:40 8 even higher. So everything that I believe we've
 11:11:43 9 counted meets the definition of asbestos.

11:11:46 10 Q. (By Mr. Bailey) I lost the question
 11:11:47 11 there.

11:11:48 12 The question is other than an aspect ratio
 11:11:54 13 of 5:1 would cause you to include a fiber as
 11:11:59 14 asbestos, did you apply anything else to rule out
 11:12:03 15 things that were five times longer than they were
 11:12:07 16 wide but you knew were not asbestos?

11:12:11 17 A. We have excluded nonamphibole asbestos
 11:12:15 18 fibers that might have been present. We didn't count
 11:12:19 19 all the fibrous talc. We did make some notes about
 11:12:22 20 the potential of how many was there.

11:12:25 21 But when you say anything, I mean, you
 11:12:29 22 know, that pen is at least 5:1 aspect ratio.

11:12:33 23 Wouldn't call it asbestos. In the TEM we may find
 11:12:36 24 things that is a gypsum fiber. We wouldn't count it
 11:12:39 25 as asbestos. We've got to put the identification
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11:09:54 1 at -- and my understanding is -- to save a little bit
 11:09:57 2 of time, hopefully -- that you determined that you
 11:10:00 3 would use a particular method, and if what you were
 11:10:02 4 seeing in microscopy satisfied by dimension and
 11:10:09 5 aspect ratio, the definition of asbestos, that you
 11:10:13 6 would count it as asbestos; is that a fair
 11:10:15 7 assessment?

11:10:15 8 A. That's fair.

11:10:16 9 Q. In your opinion that leaves no other
 11:10:20 10 questions to be answered at all. The aspect ratio is
 11:10:25 11 all you need to know to tell me whether or not what
 11:10:28 12 you're seeing is asbestos?

11:10:29 13 A. When you say no other questions, the
 11:10:32 14 aspect ratio in the counting rules by TEM use
 11:10:37 15 different methods that tell us exactly what you count
 11:10:40 16 and report as asbestos.

11:10:43 17 Q. Have you ever in your career testified
 11:10:48 18 that using the counting method alone in TEM and
 11:10:56 19 including everything only by its aspect ratio and
 11:11:00 20 nothing else would cause you to include other things
 11:11:03 21 that you know are not asbestos?

11:11:10 22 A. Ever in my career?

11:11:15 23 Q. Yes.

11:11:16 24 A. I don't recall ever in my career.

11:11:17 25 Q. Something that is simply five times longer

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11:12:41 1 along with that, does it match the chemistry of a
 11:12:45 2 typical amphibole asbestos fiber.

11:12:48 3 Q. As you look back over your career, have
 11:12:52 4 you changed the definition of what you would include
 11:12:56 5 to be an asbestos fiber by the method you were
 11:13:00 6 applying to the test?

11:13:03 7 A. I don't believe so.

11:13:05 8 Q. If a fiber that you see in evaluating talc
 11:13:10 9 is less than 5:1 aspect ratio, do you include it as
 11:13:16 10 an asbestos fiber or not?

11:13:18 11 A. I think in the 33 or 34, I think we have
 11:13:25 12 one that's less than 5:1. But typically we tried
 11:13:31 13 about 300 -- now, we've gone back and analyzed less
 11:13:36 14 than 5:1. They're not included in the count, but
 11:13:40 15 they're included in the aspect ratio for our Blount,
 11:13:44 16 Campbell, NIST charts.

11:13:47 17 But we went back to all the samples and
 11:13:51 18 recounted them to get the lower than 5:1 aspect
 11:13:55 19 ratio. We didn't include those as asbestos. We just
 11:14:02 20 included those so that we could have, quote, less
 11:14:03 21 than 5:1 aspect ratio to match up with what Blount
 11:14:05 22 and Campbell published.

11:14:06 23 Q. And I understand the collection of data
 11:14:08 24 for other information is one thing. My appreciation
 11:14:09 25 of what you do is you apply this method, something is
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2
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 4 COUNTY OF GWINNETT:

5
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 8 caption, and the questions and answers thereto
 9 were reduced to typewriting under my direction;
 10 that the foregoing pages 1 through 192 represent
 11 a true, complete, and correct transcript of the
 12 evidence given upon said hearing, and I further
 13 certify that I am not of kin or counsel to the
 14 parties in the case; am not in the regular
 15 employ of counsel for any of said parties; nor
 16 am I in anywise interested in the result of said
 17 case.

18 This, the 5th day of April 2018.

20 _____
 21 DEBRA R. LUTHER, B-881
 Georgia Certified Court Reporter

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2 I do hereby certify that I have read all
 3 questions propounded to me and all answers given by
 4 me on the 29th day of March 2018, taken before
 Debra R. Luther, and that:

5 _____ 1) There are no changes noted.
 _____ 2) The following changes are noted:

6 Pursuant to Rule 30(e) of the Federal Rules of
 7 Civil Procedure and/or the Official Code of Georgia
 8 Annotated 9-11-30(e), both of which read in part:
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 11 Page No. _____ Line No. _____ should read: _____
 12 Page No. _____ Line No. _____ should read: _____
 13 Page No. _____ Line No. _____ should read: _____

14 If supplemental or additional pages are necessary,
 15 please furnish same in typewriting annexed to this
 deposition.

16
 17
 18 WILLIAM E. LONGO, PhD

19 Sworn to and subscribed before me,
 20 This, the _____ day of _____ 20_____.
 21

22 Notary Public
 23 My commission expires: _____
 24
 25

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